

EXHIBIT C

BAKER & HOSTETLER LLP

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Hearing Date: To be determined by
Court

Objection Deadline: To be determined
by Court

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff,

Plaintiff,

v.

STANDARD CHARTERED FINANCIAL
SERVICES (LUXEMBOURG) S.A. (f/k/a
AMERICAN EXPRESS FINANCIAL
SERVICES (LUXEMBOURG) S.A. and f/k/a
AMERICAN EXPRESS BANK
(LUXEMBOURG) S.A.), as represented by its
Liquidator HANSPETER KRÄMER,
HANSPETER KRÄMER, in his capacities as

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01565 (SMB)

liquidator and representative of STANDARD
CHARTERED FINANCIAL SERVICES
(LUXEMBOURG) S.A., STANDARD
CHARTERED BANK INTERNATIONAL
(AMERICAS) LTD., f/k/a AMERICAN
EXPRESS BANK INTERNATIONAL, and
STANDARD CHARTERED
INTERNATIONAL (USA) LTD., f/k/a
AMERICAN EXPRESS BANK LTD.,

Defendants.

**[PROPOSED] ORDER GRANTING THE TRUSTEE'S MOTION FOR LEAVE TO
FILE AN AMENDED COMPLAINT**

This cause having come before the Court on _____ on the motion ("Motion") of Irving H. Picard ("Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Baker & Hostetler LLP, seeking entry of an order, pursuant to Rule 15 of the Federal Rules of Civil Procedure, as incorporated in this proceeding by Rule 7015 of the Federal Rules of Bankruptcy Procedure, granting the Trustee's request for leave to file an Amended Complaint; and the Court having considered the Memorandum of Law in Support of the Trustee's Motion for Leave to File an Amended Complaint and the Declaration of Jonathan A. Forman in Support of the Trustee's Motion for Leave to File an Amended Complaint; and any objections thereto; and due notice of the Motion having been given, and it appearing that no other or further notice need be given; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon the proceedings before the Court and after due deliberation, it is hereby

ORDERED THAT:

1. The Motion is GRANTED.
2. The Trustee is granted leave to file his Amended Complaint.

Dated: _____, 2020,
New York, New York.

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE